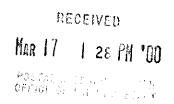
BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001



POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

JOINT MOTION FOR ACCEPTANCE OF LATE CROSS EXAMINATION DESIGNATIONS

The Association for Postal Commerce, Pitney Bowes Inc. and the Recording Industry Association of America Inc. have each today filed designations of the extent of oral cross examination of Postal Service witnesses. By the schedule established by the Commission, these designations should have been filed yesterday. Each intervenor believes that no participant in the case will be materially prejudiced by the acceptance of their slightly untimely designations, apologizes to the Commission's staff for any administrative inconvenience occasioned by the tardy designations and requests that the designations be accepted for filing.

Respectfully submitted,

Ian D. Volner

N. Frank Wiggins

Venable, Baetjer, Howard & Civiletti, LLP

1201 New York Avenue, N.W.

Suite 1000

Washington, DC 20005-3917

Counsel for Association for Postal Commerce, Pitney Bowes Inc. and Recording Industry Association of America Inc.

March 17, 2000

CERTIFICATION

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding having requested service of discovery documents in accordance with Section 12 of the rules of practice.

Ian D. Volner

Dated: March 17, 2000